



The Atlantic Foundation

September 23, 2024

BY ECF

The Honorable Katharine H. Parker
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: Plaintiff's Unopposed Request for Extension to File - Amended Complaint
Thompson v. Lemon, et al., No. 23-cv-2102 (JPO) (KHP)

Dear Judge Parker:

As *pro bono* counsel, I write on behalf of Plaintiff Kwaine Thompson ("Plaintiff"), pursuant to Your Honor's Individual Rules of Practice, to request an extension of time to file Plaintiff's amended complaint, which is currently due on September 28, 2024. *See* ECF No. 16.

Plaintiff respectfully requests an additional thirty (30) days, which would make the amended complaint due by October 28, 2024. This is Plaintiff's first request for extension. In part, this request is necessary because Mr. Thompson's communication capabilities are limited since he remains incarcerated. For example, the majority of our communication is done by first-class mail, which imaginably presents its own challenges.

As for the defendants' position, counsel stated the following: "The Office of Corporation Counsel takes no position, particularly as we do not represent any defendants in this case."

Thank you very much. I sincerely appreciate the Court's attention to this matter.

Respectfully,

/s/ Sami Elamad
Sami Elamad

cc: Counsel of record (via ECF)

Plaintiff's request is GRANTED. Plaintiff shall file the amended complaint by **October 28, 2024**. In addition, the parties shall file a letter by **November 25, 2024** proposing a discovery schedule. The Clerk of Court is respectfully directed to terminate the motion at ECF No. 17.

SO ORDERED:

Katharine H. Parker
HON. KATHARINE H. PARKER
UNITED STATES MAGISTRATE JUDGE

9/24/2024